

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
MONROE DIVISION

BENJAMIN CRAIG, Individually and
On Behalf of All Others Similarly Situated,

Plaintiff,

vs.

CENTURYLINK, INC., GLEN F. POST, III and
R. STEWART EWING, JR.,

Defendants.

Civil Action No.: 17-cv-01005

Judge Robert G. James

Magistrate Judge Joseph H. L. Perez-
Montes

DON J. SCOTT, Individually and
On Behalf of All Others Similarly Situated,

Plaintiff,

vs.

CENTURYLINK, INC., GLEN F. POST, III, R.
STEWART EWING, JR. and DAVID D. COLE,

Defendants.

Civil Action No.: 17-cv-01033

Judge Robert G. James

Magistrate Judge Joseph H. L. Perez-
Montes

AMARENDRA THUMMETI, Individually and
On Behalf of All Others Similarly Situated,

Plaintiff,

vs.

CENTURYLINK, INC., GLEN F. POST, III, and
R. STEWART EWING, JR.,

Defendants

Civil Action No.: 17-cv-04695

*Joint Stipulation filed on August 16, 2017
to transfer case to U.S.D.C. Western
District of Louisiana*

**MOTION OF SONA ANDRESIAN FOR CONSOLIDATION OF THE ACTIONS,
APPOINTMENT AS LEAD PLAINTIFF
AND APPROVAL OF HER CHOICE OF COUNSEL**

NOW INTO COURT, through undersigned counsel, comes Sona Andresian (“Movant”), who, pursuant to § 21(D) *et seq.* of the Securities Exchange Act of 1934 (“Exchange Act”), as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”), respectfully moves for an Order: (1) consolidating the above-captioned actions; (2) appointing Movant as lead plaintiff in this action, pursuant to Section 21D(a)(3)(B) of the Exchange Act, as amended by Section 10(b) of the PSLRA; and (3) approving Movant’s selection of Gainey McKenna & Egleston (“GM&E”) as lead counsel and the law firm of Pendley, Baudin & Coffin as liaison counsel for the Class.

This motion is made on the grounds that Movant is the “most adequate plaintiff” pursuant to the Exchange Act. *See* 15 U.S.C. § 78u-4(a)(3)(B). Movant also meets the requirements of Fed. R. Civ. P. 23(a) because her claims are typical of the claims of the remaining class members and because she will fairly and adequately represent the Class. Further, Movant has selected and retained counsel with substantial experience in prosecuting securities fraud class actions to serve as lead counsel.

The facts and law supporting this Motion are fully set forth in the accompanying Memorandum of Law in Support of the Motion of Sona Andresian for Consolidation of the Actions, Appointment as Lead Plaintiff and Approval of Her Choice of Counsel.

WHEREFORE, Movant, prays for an Order of this Court: (1) consolidating the above-captioned actions; (2) appointing Sona Andresian lead plaintiff; (3) appointing GM&E as lead counsel and Pendley, Baudin & Coffin as liaison counsel; and (4) granting such other relief as the Court may deem just and proper.

Dated: August 21, 2017

Respectfully Submitted,

PENDLEY, BAUDIN & COFFIN

By: 

Patrick W. Pendley

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Proposed Liaison Counsel for the Class

GAINEY McKENNA & EGGLESTON

Gregory M. Egleston

Thomas J. McKenna

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New York, NY 10016

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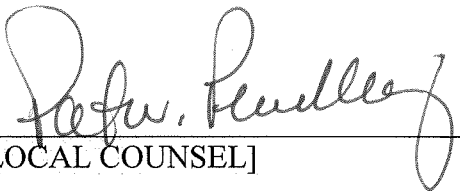
Facsimile: (212) 983-0383

Proposed Lead Counsel for the Class

CERTIFICATE OF SERVICE

I hereby certify that on August 21, 2017, I authorized the electronic filing of the foregoing with the Clerk of Court using the CMF/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on August 21, 2017.


[LOCAL COUNSEL]